

Theodore H. Frank (SBN 196332)  
Adam E. Schulman (admitted *pro hac vice*)  
HAMILTON LINCOLN LAW INSTITUTE  
1629 K Street NW, Suite 300  
Washington, DC 20006  
Voice: 610-457-0856  
Email: adam.schulman@hlli.org

*Attorneys for Plaintiff Christopher Kohls*

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA**

Christoper Kohls,

Plaintiff,

v.

Rob Bonta, et al.,

Defendants.

Case No. 2:24-cv-02527-JAM-CKD

**[PROPOSED] ORDER to Consolidate**

**Judge:** John A. Mendez

The Babylon Bee, LLC, et al.

Plaintiffs,

v.

Rob Bonta, et al.

Defendants.

Case No. 2:24-cv-02787-JAM-CKD

1 Before the Court is Plaintiffs The Babylon Bee, LLC and Kelly Chang Rickert,  
2 Plaintiff Christopher Kohls, and Defendants Rob Bonta and Shirley N Weber's joint  
3 stipulation to consolidate *The Babylon Bee, LLC v. Bonta*, No. 2-24-cv-2787, with *Kohls v.*  
4 *Bonta*, No. 2:24-cv-02527.

5 The Court can "consolidate" actions that "involve a common question of law or  
6 fact[.]" Fed. R. Civ. P. 42(a). All of the consolidation factors either weigh in favor of  
7 consolidation or are neutral.

8 The Court thus hereby orders the clerk to CONSOLIDATE *The Babylon Bee, LLC*  
9 *v. Bonta*, No. 2-24-cv-2787, with *Kohls v. Bonta*, No. 2:24-cv-02527.

10  
11 It is so ORDERED.

12  
13 DATED: \_\_\_\_\_, 2024

14 \_\_\_\_\_  
15 The Honorable John A. Mendez  
16 Senior United States District Judge  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**PROOF OF SERVICE**

I hereby certify that I filed a true and accurate copy of the foregoing document with the Clerk of Court using the CM/ECF system, which automatically sends an electronic notification to all counsel of record.

DATED this 22nd day of October, 2024.

s/ Adam E. Schulman

Adam E. Schulman

Counsel for Plaintiff Christopher Kohls